

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

The Testor Corporation  
Attn: Jim Corrison  
620 Buckbee Street  
Rockford, Illinois 61104

<u>Application No.:</u> 72110997	<u>I.D. No.:</u> 201030AEY
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 22, 2003
<u>Subject:</u> Paint and Adhesive Manufacturing Facility	
<u>Date Issued:</u> October 14, 2003	<u>Expiration Date:</u> March 27, 2006
<u>Location:</u> 615 Buckbee Street and 440 Blackhawk Street, Rockford	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of the ball and roller milling stations, the paint and cement mixing stations, an aerosol paint can filling line, a pressurized propellant storage tank, and fourteen product filling lines pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the two above-referenced locations constituting single source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Production rate and VOM emissions from the paint and adhesive manufacturing operations shall not exceed the following limits:

<u>Production Rate</u>		<u>Emission Factor</u>	<u>VOM Emissions</u>	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Wt. %)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
550	5,400	1.5	8.3	81.0

- b. Operation and VOM emissions from the aerosol can filling operations shall not exceed the following limits:

<u>Can Filling Rate</u>		<u>Emission Factor</u>	<u>VOM Emissions</u>	
<u>(10<sup>3</sup> Can/Mo)</u>	<u>(10<sup>3</sup> Can/Yr)</u>	<u>(Lb/10<sup>3</sup> Can)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
3,855	46,250	0.2	0.4	4.6

- c. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
  - d. HAP emissions shall be calculated as a fraction of VOM emission proportional to the HAP/VOM ratio in the used raw materials.
  - e. These limits define the potential emissions of VOM and HAP and are based on the actual emissions determined from the maximum production rate and standard emission factor for paint manufacturing and propellant filling line manufacturer's emission factor. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
3. Operations and particulate matter (PM) emission from solids handling operations shall not exceed the following limits:

<u>Solids Usage</u>		<u>Emission Factor</u> (Wt.%)	<u>PM Emission</u>	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
100	1,000	1	1.0	10.0

These limits are based on the maximum production rate and standard emission factors for solids handling. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. The Permittee shall maintain monthly records of the following items:
  - a. Paint and adhesive production (ton/mo; ton/yr);
  - b. Names and amount of solvents used (ton/mo; ton/yr);
  - c. VOM and HAP content in the solvents (lb/gal; wt. %);
  - d. Names and amount of propellants used (ton/mo; ton/yr);
  - e. VOM and HAP emission calculations (ton/mo; ton/yr).
5. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

6. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
7. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. Paint and adhesive production rate (ton/yr).
8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA  
Division of Air Pollution Control - Regional Office  
5415 North University  
Peoria, Illinois 61614

It should be noted that this permit has been revised to include operation of one product filling line without any increase in production and emission limitations.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:VJB:psj

cc: Illinois EPA, FOS Region 2  
Illinois EPA, Compliance Section  
Lotus Notes

### Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Paint and Adhesive Manufacturing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is production of 5,400 tons of paint and adhesive per year. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Process</u>	VOM	Emissions (Tons/Year)	PM
		<u>          </u>	
Paint/Adhesive Manufacturing	81.0		--
Aerosol Can Filling	4.6		--
Solids Handling	<u>      </u>		<u>10.0</u>
Total	85.6		<u>10.0</u>

VJB:psj